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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LISA MARIE SANTOS,
Defendant.

CASE NO. 1:22-CR-00208-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

TRIAL DATE: May 21, 2024
TIME: 8:30 a.m.
COURT: Hon. Jennifer L. Thurston

This case is set for Jury Trial on May 21, 2024. Defendant Lisa Marie Santos's case has resolved, and the parties have filed a plea agreement for the Defendant. (ECF # 56).

As set forth below, the parties now request, by stipulation, that the Court (1) vacate the May 21, 2024 trial date as to this Defendant, (2) set the matter for change of plea May 13, 2024 at 9:00 am, and (3) exclude time between the date of the Court's Order through and including May 13, 2024 under the Speedy Trial Act.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for Jury Trial on May 21, 2024.
2. By this stipulation, the parties now request that the Court (1) vacate the May 21, 2024 trial date as to this Defendant, (2) set the matter for change of plea May 13, 2024 at 10:00 am for both defendants, and (3) exclude time between the date of the Court's Order through and including May 13,

2024 under the Speedy Trial Act.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case is voluminous and includes many thousands of hours of reports, financial records, and computer forensics evidence. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time consult with his/her client, to review the current charges, to conduct further investigation and research related to the charges, to review discovery, to prepare for the plea and sentencing hearing in this case.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of date of the Court's Order to May 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 14, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JEFFREY A. SPIVAK
JEFFREY A. SPIVAK
Assistant United States Attorney

Dated: March 14, 2024

/s/ EDWARD M. ROBINSON
EDWARD M. ROBINSON
Counsel for Defendant
Lisa Marie Santos

FINDINGS AND ORDER

The May 21, 2024 trial date is vacated as to Defendant Lisa Marie Santos. The Court sets the matter for change of plea on May 13, 2024 at 9:00 am. The Court finds and orders that time be excluded between the date of the Court's Order through and including May 13, 2024 under the Speedy Trial Act for this reasons set forth in the Stipulation.

IT IS SO ORDERED.

Dated: March 19, 2024


UNITED STATES DISTRICT JUDGE